

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

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ALISHA ROSINEK, on Behalf of Herself and All )  
Other Similarly Situated Shareholders of )  
PSYCHIATRIC SOLUTIONS, INC., ) Case No. 3:10-cv-534  
Plaintiff, )  
v. )  
PSYCHIATRIC SOLUTIONS INC., UNIVERSAL )  
HEALTH SERVICES, INC., OLYMPUS )  
ACQUISITION CORP., JOEY A. JACOBS, MARK )  
P. CLEIN, DAVID M. DILL, RICHARD D. GORE, )  
CHRISTOPHER GRANT, JR., WILLIAM M. )  
PETRIE, EDWARD K. WISSING, RONALD M. )  
FINCHER; CHRISTOPHER L. HOWARD, JACK E. )  
POLSON and BRENT TURNER, )  
Defendants. )

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**DECLARATION OF J. GERARD STRANCH, IV IN SUPPORT OF PLAINTIFF'S  
MOTION FOR EXPEDITED DISCOVERY AND PROCEEDINGS FOR A  
PRELIMINARY INJUNCTION**

I, J. GERARD STRANCH, IV, hereby declare as follows:

1. I am an attorney at law, licensed to practice in the State of Tennessee and am one of the counsel of record for plaintiff in the above-captioned matter. I make this declaration in support of Plaintiff's Motion for Expedited Discovery and Proceedings for a Preliminary Injunction. I have personal knowledge of the matters stated herein and, if called upon, could and would competently testify thereto.
2. Following the commencement of the action, I had a series of communications with Travis Parham, one of the counsel for defendant Psychiatric Solutions, Inc. ("PSI") and certain individual defendants. During the course of our discussions, Mr. Parham raised with me the possible parameters by which discovery in this action could be coordinated with the discovery

contemplated in a shareholder action pending in the Court of Chancery in the State of Delaware styled *In re Psychiatric Solutions, Inc. Shareholders Litigation*, Cons. C.A. No. 5514-CC (“Delaware Action”). The Delaware Action challenges the sufficiency of the proposed acquisition of PSI by Universal Health Services, Inc. (“Universal”). Unlike the Delaware Action, however, this action asserts claims for violations of Sections 14(a) and 20(a) of the Securities Exchange Act of 1934.

3. Prior the July 4<sup>th</sup> holiday weekend, I had a follow-up with Mr. Parham in an effort to coordinate document and deposition discovery with the contemplated discovery in the Delaware Action. During this conversation, Mr. Parham represented that depositions would not commence for “two weeks”.

4. However, late in the afternoon of Friday, July 9, 2010, during a subsequent conversation with Mr. Parham, I learned that two depositions in fact had been conducted on that same day, without any prior notification to counsel in this action. These two depositions were critical to the claims alleged in this action, and were of Goldman Sachs & Co, investment advisor to PSI and defendant Richard D. Gore.

I declare under penalty of perjury under the laws of the State of Tennessee that the foregoing is true and correct. Executed this 12<sup>th</sup> day of July, 2010 at Nashville, Tennessee.

/s/ J. Gerard Stranch, IV  
J. Gerard Stranch, IV

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 12, 2010, a true and correct copy of the foregoing document was served on the following via the Court's CM/ECF Electronic Filing System:

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On this 12<sup>th</sup> day of July, 2010

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/s/ J. Gerard Stranch, IV  
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